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KO83551

Section 5.0

510 (k) Summary

FEB 2 0 2009

Note: This summary is provided in accordance with 21CFR807.92 (c).

510 (k) Owners Name:

Reliance Orthodontic Products, Inc.

Paul Gange, President

Address:

1540 West Thorndale Avenue

Itasca, Il 60143 USA

Phone Number:

630-773-4009

Fax Number:

630-250-7704

Contact Person:

Paula Wendland, Regulatory Affairs Manager (Preparer)

Date 510 (k) Summary was Prepared: October 10, 2008

Medical Device Name:

- Trade name Flowtain™ and Flowtain™ LV
- Common name Flowable Light Cure Orthodontic Adhesive
- Classification name Bracket Adhesive Resin and Tooth Conditioner (21CFR872.3750, Product Code DYH, Class II Device)

LEGALLY MARKETED DEVICE TO WHICH EQUIVALENCE IS CLAIMED (PREDICATE DEVICE) [807.92(a) (3)]:

- 3M Unitek Transbond™ Supreme LV
- Bisco Inc. TESCERAFLOTM

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5.1 DESCRIPTION OF THE APPLICANTS DEVICE:

FlowtainTM is a light-cure orthodontic adhesive with a low modulus of elasticity that is flowable. This low modulus of elasticity makes it ideal for bonding lingual retainers, splinting materials and for indirect bonding of brackets. Thixotropic design properties of FlowtainTM also make it highly polishable which allows it to be used for comfortable archwire stops and as an aid for retention of a thermoplastic aligner.

Flowtain[™] LV is a low viscosity version of the Flowtain[™] product used primarily for indirect bonding of brackets.

Both are available in push syringe or tips for preferences in dispensing.

5.2 INTENDED USE AND POPULATION:

Flowtain[™] is a flowable, light-cure orthodontic adhesive intended to be used within an orthodontic, dental or pediatric dental office for the bonding of lingual retainers and splinting materials, creation of archwire stops and indirect bonding of orthodontic brackets. Flowtain[™] can also be used for the retention of thermoplastic aligners.

FlowtainTM LV is a lower viscosity, flowable light cure orthodontic adhesive intended to be used for indirect bonding of orthodontic brackets.

5.3 PREDICATE DEVICE:

3M Unitek Transbond™ Supreme LV, 510(k) submission (K073697) dated 02/15/2008 for intended use.

Flowtain[™] and Flowtain[™] LV are similar in composition as Bisco Inc. TESCERAFLO[™], 510(k) submission (K030951) for safety and performance.

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5.4 TECHNOLOGICAL AND PERFORMANCE CHARACTERISTICS:

Performance Characteristics of Flowtain[™] versus Transbond[™] Supreme LV:

Property	Flowtain	Transbond Supreme LV
Intended Use	Flowable Light Cure adhesive for bonding lingual retainers and indirect bonding of orthodontic brackets	Flowable Light Cure Adhesive for indirect bonding of orthodontic brackets and bonding to enamel surfaces.
Mechanical / Physical Properties	Single paste in a hand-held delivery system.	Single paste in a hand-held delivery mechanism.
_	Flowable Composite	Flowable Composite

Performance Characteristics of FlowtainTM and FlowtainTM LV versus TESCERAFLO TM:

Property	Flowtain™ and Flowtain™ LV	TESCERAFLOTM
Intended	Flowable Light Cure adhesive	Flowable Light Cure adhesive
Use	for direct and indirect bonding	for direct or indirect restorations
Chemical	Ethoxylated Bisphenol A	Ethoxylated Bisphenol A
Composition	Dimethacrylate	Dimethacrylate
_	Triethyleneglycol	Triethyleneglycol
	Dimethacrylate	Dimethacrylate
	Glass Filler	Glass Filler

5.5 Summary:

FlowtainTM and Flowtain LV were tested against TransbondTM Supreme LV using in-vivo performance test method for shear bond strength. Testing was conducted using indirect bonding procedure in replicates of 5 for FlowtainTM, FlowtainTM LV and TransbondTM Supreme LV, the predicate device. Testing resulted in similar performance between the two adhesives.

FlowtainTM has been tested and proven to be non-toxic.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

FEB 2 0 2009

Ms. Paula Wendland Regulatory Affairs Manager Reliance Orthodontic Products, Incorporated 1540 West Thorndale Avenue Itasca, Illinois 60143

Re: K083051

Trade/Device Name: FlowtainTM and FlowtainTM LV

Regulation Number: 21CFR 872.3750

Regulation Name: Bracket Adhesive Resin and Tooth Conditioner

Regulatory Class: II Product Code: DYH, EBF Dated: February 13, 2009 Received: February 17, 2009

Dear Ms. Wendland:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, lesting of devices, good manufacturing practice, as labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal</u> Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at 240-276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at 240-276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours.

Ginette Y. Michaud, M.D.

Acting Director

Division of Anesthesiology, General Hospital, Infection Control and Dental Devices Office of Device Evaluation Center for Devices and

Radiological Health



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SECTION 6.0 INDICATIONS FOR USE STATEMENT

Indications for Use 510 (k) Number (if known): Device Name: Flowtain™ and Flowtain™ LV Indications for Use: Flowtain[™] is a flowable, light-cure orthodontic adhesive intended to be used within an orthodontic, dental or pediatric dental office for the bonding of lingual retainers and splinting materials, creation of archwire stops and indirect bonding of orthodontic brackets. FlowtainTM can also be used for the retention of thermoplastic aligners. Flowtain™ LV is a lower viscosity, flowable light cure orthodontic adhesive intended to be used for indirect bonding of orthodontic brackets. Prescription Use X Over-The-Counter Use AND/OR (Part 21 CFR 801 Subpart D) (21 CFR 801 Subpart C) (Division Sign-Off) Division of Anesthesiology, General Hospital Infection Control, Dental Devices 510(k) Number: